

UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT
OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ISAIAH LUTHER MERCER,
a/k/a "LOVEY"

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CRIMINAL NO. 03-19- Erie

MOTION FOR EXTENSION OF TIME TO FILE PRE-TRIAL MOTIONS

AND NOW, comes the defendant, Isaiah Luther Mercer, by and through his attorney, Gene P. Placidi, Esquire, and files the following Motion for Extension of Time to File Pre-Trial Motions, averring in support thereof as follows:

1. The defendant is charged by federal indictment at the above term and number With one (1) count of Possession With Intent to Distribute 50 grams or More of Cocaine Base, a Scheduled II Controlled Substance.
2. The defendant was granted a second Extension of time by this Honorable Court to file any and all pre-trial motions. Defendant's pre-trial motions are due on or before February 27, 2006.
3. The defendant is attempting to cooperate with the government and is in need of additional time to file pre-trial motions.
4. Consequently, the undersigned respectfully request that the Court grant him an additional thirty (30) days to file any pre-trial motions on behalf of the defendant.

WHEREFORE, the undersigned respectfully requests that the Court Enter an Order granting him an additional thirty (30) days to file any and all pre-

trial motions on behalf of the defendant, Isaiah Luther Mercer, regarding the above captioned matter.

Respectfully submitted,

By: /s/ Gene P. Placidi
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